



**ANDERSON, BOWMAN
WALLSHEIN PLLC**

New York City
80-02 Kew Gardens Rd.
Suite 600
Kew Gardens, NY 11415
(718) 263-6800

Long Island
35 Pinelawn Road
Suite 106E
Melville, NY 11747
(631) 824-6555

Mark Anderson, Esq. • Dustin Bowman, Esq. • Charles Wallshein, Esq.
Btzalel Hirschhorn, Esq. • Matthew J. Routh, Esq. • Nicholas Neocleous, Esq. • Kimberly Wroblewski, Esq.

June 3, 2025

VIA ECF

Hon. Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York, 11201

**Re: *Bidar v. Eckert, Seamans, Cherin & Mellott, LLC, et al.*,
Case No. 1:25-cv-01828-MKB-JAM**

Dear Judge Brodie,

We represent Plaintiff Sheila Bidar as legal guardian of Ruth Athill ("Plaintiff") in the above-captioned matter. Pursuant to Your Honor's Individual Practice and Rules, Section 1.F, we respectfully submit this letter-motion to request an extension of time to file the joint letter and completed civil case management plan currently due June 11, 2025.

This is the first request for an extension and as such no previous request has been granted nor denied. The reason for this request is that on May 23, 2025, Plaintiff submitted a letter motion requesting that the instant case, along with four other cases, be related pursuant to Rule 3(b) of the Guidelines for the Division of Business Among District Judges for the Eastern District of New York (ECF Dkt. No. 34). Because the outcome of the motion to relate may directly affect judicial assignments and case management scheduling, Plaintiff is requesting a brief extension to file the joint letter and civil case management plan.

Plaintiff has conferred with counsel for the defendants in this action, who have consented to this extension. Additionally, the requested extension will promote judicial efficiency and conserve resources while the Court considers whether the related actions should proceed together.

The original due date for the filings is June 11, 2025. No other dates have yet been scheduled in this action. Should the Court grant an extension, we respectfully propose that the submission of the joint letter and civil case management plan be rescheduled to a date at the Court's convenience following resolution of the pending motion to relate.

We thank the Court for its attention to this matter, and should you have any questions please feel free to contact our office.

Sincerely,
**Anderson, Bowman &
Wallshein, PLLC**

/s/ Mark S. Anderson
By: Mark S. Anderson Esq.